

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
Section 68.4(a) of the Commission's Rules,)	WT Docket No. 01-309
Hearing Aid-Compatible Telephones)	RM-8658

**Reply Comments of Dana Mulvany To Notice of Proposed
Rulemaking Regarding the Proposed Elimination of The
Exemption of Public Mobile Service Phones from the
Hearing Aid Compatibility Act of 1988**

I, Dana Mulvany, submit my reply comments as a hard of hearing individual with hearing loss in both ears. (I am not speaking on behalf of any organization with which I may be affiliated.) I respond to comments by Ron Vickery and the Cellular Telecommunications & Internet Association submitted in this proceeding.

It is becoming more widely known that some clamshell phones using CDMA protocol appear to be free from significant interference for hearing aid users. I myself have been using the LG TM-510 phone on the Verizon Wireless network for eight months, and have encouraged many people with hearing aids to try listening to the phone. Not one person has complained of interference from the phone itself. (Many different types of hearing aids were used.)

On page 21 of his comments, Ron Vickery shows that the main source of interference in a phone using a TDMA network is from an (unshielded) battery, not RF. He also showed on page 16 and 17 that a tin box is an effective shield against interference. These findings suggest that the possibility of developing effective shielding around a cell phone battery (and perhaps other small components) would prevent the interference from reaching the earpiece and thus the hearing aid.

CTIA appears to incorrectly attribute the interference problem to the interaction between RF and hearing aids (page 4). Mr. Vickery's documentation shows that RF is not the direct cause of interference; instead, the battery is the dominant cause of interference. Mr. Vickery's work shows the importance of tracking down exactly what the source of interference is, and analyzing how best to reduce the interference.

Contrary to CTIA's position that hearing aids must be immunized, it is important to recognize the existence of compatible digital phones that appear to work with **all hearing aids, including those that have not been immunized**. These phones currently use the CDMA protocol. However, even some clamshell CDMA phones

generate interference. From personal observation, they appear more likely to generate interference if there is a battery on the earpiece itself and if they have an activated backlight. It appears technically feasible to design the location of the battery to be on the keypad of the phone and to develop a mechanism for quickly turning the backlight off or on.

CTIA has provided little evidence of actively working on resolving the interference problem. Ron Vickery and George deVilbiss, however, have used personal resources to provide more useful information about interference from digital phones than the industry has provided; both are hard of hearing with very strong backgrounds in electronics.

A year ago, in my comments to the FCC regarding the Wireless Access Coalition's petition to revisit the exemption of wireless phones from HAC, I suggested "Perhaps the FCC could somehow encourage the industry to pool resources in researching and sharing methods for reducing interference..... The chances for success would be even greater if the industry would work directly with knowledgeable users of hearing aids in searching for and trying solutions." In order for us to move ahead in finding technical solutions available to all cell phone manufacturers, a body of qualified researchers independent of the wireless industry may need to be funded and charged with the task of finding technically feasible solutions for reducing interference and providing hearing-aid compatibility. Including hard of hearing people in such efforts who are highly motivated to find solutions, such as Ron Vickery and George deVilbiss, would likely make the probability of success much higher.

Please remove the exemption of wireless phones from hearing aid compatibility requirements.

Thank you for your efforts to address this issue.

Sincerely,

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